

UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-1(b)	
MAUNE RAICHLE HARTLEY FRENCH & MUDD, LLC Clayton L. Thompson, Esq. cthompson@mrhfmlaw.com Suzanne M. Ratcliffe, Esq. sratcliffe@mrhfmlaw.com 150 West 30 <sup>th</sup> Street, Suite 201 New York, New York 10001 Tel: (800) 358-5922 <i>Attorneys for Mesothelioma Claimants Katherine Tollefson, Sandra Weathers, Mary Jackson, Elizabeth Meikle, Marzena Zachara, Robert Radin, and Christine Woodfin</i>	COONEY & CONWAY Kathy Byrne, Esq. kbyrne@cooneyconway.com 120 N. LaSalle Street, Suite 3000 Chicago, Illinois 60602 Tel: (312) 236-6166 <i>Attorneys for Mesothelioma Claimant Giovanni Sosa</i> <i>*Admitted Pro Hac Vice</i>
LEX NOVA LAW, LLC E. Richard Dressel, Esq. rdressel@lexnovalaw.com 10 E. Stow Road, Suite 250 Marlton, New Jersey 08053 Tel: (856) 382-8211 <i>Attorneys for Mesothelioma Claimants Evan Plotkin and Giovanni Sosa</i>	DEAN OMAR BRANHAM SHIRLEY, LLP J. Bradley Smith, Esq. Bsmith@dobslegal.com 302 N. Market Road Suite 300 Dallas, Texas 75202 Tel: (214) 722-5990 <i>Attorneys for Mesothelioma Claimant Evan Plotkin</i> <i>*Admitted Pro Hac Vice</i>

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

In re:	)	
	)	
LTL MANAGEMENT LLC,	)	Lead BK Case: 23-12825-MBK
	)	
Debtor.	)	

**AD HOC GROUP OF MESOTHELIOMA CLAIMANTS' PROPOSED FINDINGS OF  
FACT AND CONCLUSIONS OF LAW IN SUPPORT OF THEIR MOTION TO  
DISMISS THE SECOND BANKRUPTCY PETITION OF LTL MANAGEMENT**

The Ad Hoc Group Mesothelioma Claimants,<sup>1</sup> in the interests of judicial economy, hereby adopt all evidence contained and referenced in the Proposed Findings of Fact and Conclusions of Law filed by the Official Committee of Talc Claimants, and join all arguments contained therein. The Ad Group asks this Court to dismiss this case.

Respectfully submitted:

**MAUNE RAICHLE HARTLEY  
FRENCH & MUDD, LLC**

*/s/ Clayton L. Thompson*

---

Clayton L. Thompson, Esq.  
cthompson@mrhfmlaw.com  
MAUNE RAICHLE HARTLEY  
FRENCH & MUDD, LLC  
150 W. 30<sup>th</sup> Street, Suite 201  
New York, NY 10001

---

<sup>1</sup> The Ad Hoc Group is composed of claimants Katherine Tollefson, Evan Plotkin and Giovanni Sosa (all appellants to the Third Circuit in *LTL1*), joined in this Request by Sandra Weathers, Mary Jackson, Elizabeth Meikle, Marzena Zachara, Robert Radin, and Christine Woodfin, all mesothelioma claimants.

(800) 358-5922

*Attorneys for Mesothelioma Claimants  
Katherine Tollefson, Sandra Weathers,  
Mary Jackson, Elizabeth Meikle, Marzena Zachara,  
Robert Radin, and Christine Woodfin*

**COONEY & CONWAY**

*/s/ Kathy Byrne*

---

Kathy Byrne, Esq.  
kbyrne@cooneyconway.com  
120 N. LaSalle Street, Suite 3000  
Chicago, Illinois 60602  
Tel: (312) 236-6166  
*Attorneys for Mesothelioma Claimant Giovanni Sosa  
\*Admitted Pro Hac Vice*

**DEAN OMAR BRANHAM SHIRLEY, LLP**

*/s/ J. Bradley Smith*

---

J. Bradley Smith, Esq.  
Bsmith@dobslegal.com  
302 N. Market Road  
Suite 300  
Dallas, Texas 75202  
Tel: (214) 722-5990  
*Attorneys for Mesothelioma Claimant Evan Plotkin  
\*Admitted Pro Hac Vice*

**LEX NOVA LAW, LLC**

*/s/ E. Richard Dressel*

---

E. Richard Dressel, Esq.  
rdressel@lexnovalaw.com  
10 E. Stow Road, Suite 250

Marlton, New Jersey 08053

Tel: (856) 382-8211

*Attorneys for Mesothelioma Claimants Evan Plotkin and Giovanni Sosa*